

PD-0788-20

ENRIQUE ANGEL RAMOS

v.

THE STATE OF TEXAS

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IN THE COURT

OF CRIMINAL APPEALS

STATE OF TEXAS

FILED  
 COURT OF CRIMINAL APPEALS  
 1/7/2021  
 DEANA WILLIAMSON, CLERK

**APPELLANT'S MOTION FOR EXTENSION OF TIME TO FILE  
BRIEF ON THE MERITS**

COMES NOW Appellant Enrique Angel Ramos, by and through his newly appointed attorney Victoria Guerra, and files this motion for extension of time to file Appellant's brief on the merits and in support thereof, would show this Court the following:

Appellant's brief on the merits is due on January 6, 2020. The Undersigned has not been able to complete this brief on the merits for the following reasons:

1. The Undersigned was appointed to represent the Appellant in this cause on December 7, 2020. The Undersigned was not the trial or prior appellate counsel in this case. The Undersigned is having to read the entire appellate record, as well as all briefs filed in the court of appeals and the PDR filed by the State Prosecuting Attorney in this case. She is also having to research the issues in this case and respond appropriately.

2. The Undersigned also has the following deadlines: On November 16, 2020, the Undersigned had due in the Thirteenth Court of Appeals, Petitioner's brief in the

case of *Francisco Lopez v. State*, appellate cause no. 13-19-00601-CR. The brief is now due on January 15, 2021, with no other extensions allowed.

2. On December 2, 2020, the Undersigned had due and did file in this Court, a petition for discretionary review in the case of *Rocio Rivera-Garcia v. State of Texas*, cause number PD-0766-20.

3. The Undersigned has due also on January 15, 2021, response to the Board of Nursing in a disciplinary action brought against A.G. The records is almost 2000 pages and much time is going into preparing for said response. A request for an extension of time has been requested.

4. The Undersigned has due in this Court on January 13, 2021, an out of time PDR in the case of *Adames v. State*, appellate cause number 13-15-00569-CR, PD cause number not yet assigned ordered through writ number WR-91,961-01.

5. The Undersigned was set for a sentencing hearing on January 6, 2021 in the United States District Court, Southern District of Texas, McAllen Division in the case of *United States of America v. Carlos Alejandro Ventura-Medina*, cause number 20-CR-01510-01.

6. The Undersigned is scheduled to speak at the Hidalgo County Bill of Rights: HCBA Criminal Law Conference on January 28 and 29, 2021 and much time is going into preparation for said presentation.

7. The Undersigned has due on January 27, 2021, a PDR in the case of *Santiago Jacobo Martinez v. State*, cause number PD-1112-20.

8. The Undersigned felt under the weather for non-covid reasons (allergy infection) from December 14, 2020 to December 21, 2020 and was not able to complete all of her legal tasks during that period of time. She then had out of town guests during the holidays, which prevented her from completing all work obligations.

9. The backdrop of these multiple deadlines is the Covid pandemic from which four (4) members of the Undersigned's family have died. Four other relatives have died from non-Covid reasons in the last six months, the most recent having died in early November 2021.

For the foregoing reasons, the Undersigned is seeking at least a 90-day extension to file Appellant's brief on the merits. If granted, the new deadline be April 6, 2021.

WHEREFORE, Appellant prays that this Court grant an extension of time to file his brief on the merits to April 6, 2021.

Respectfully submitted,

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By: /s/ Victoria Guerra  
Victoria Guerra  
State Bar No. 08578900  
Attorney for Appellant

**CERTIFICATE OF SERVICE**

On this 6th day of January 2021, the foregoing motion for extension of time to file Appellant's brief on the merits was to State Prosecuting Attorney John R. Messinger to his email address: [information@spa.texas.gov](mailto:information@spa.texas.gov) and to Hidalgo Assistant Criminal District Attorney Luis Gonzalez to his email address: [appeals@da.co.hidalgo.tx.us](mailto:appeals@da.co.hidalgo.tx.us) via the ECF filing system.

/s/ Victoria Guerra  
Victoria Guerra

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Status as of 1/7/2021 9:10 AM CST

#### Case Contacts

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#### Associated Case Party: EnriqueAngelRamos

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